

New connects		
- Single Line	2/1/97C	EDI mapping requirements received from AT&T on 1/13/97. Development of this functionality with straight line directory listings was completed on 2/1/97. SWBT is currently performing internal testing. <sup>3,4</sup>
- Multi-Line (Less Than 30 Lines)	2/1/97C	EDI mapping requirements received from AT&T on 1/13/97. Development of this functionality with straight line directory listings was completed on 2/1/97. SWBT is currently performing internal testing. <sup>3,4</sup>
- Projects (Large Job - add'l facilities/coordinated work effort required - need SWBT criteria)	7/1/97T	Pre-order information must be requested prior to sending a firm order via EDI. <sup>3,4</sup> Preliminary definitions of business scenarios and documentation provided to AT&T 3/6/97. AT&T and SWBT have agreed to mutually negotiate an implementation date for this functionality that may be beyond 6/1/97.
Disconnects	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. <sup>2,3</sup>
Change Orders		
- Add/Disc Class Features	3/1-4/1/97C	Development of this functionality is complete. SWBT is currently performing internal testing. <sup>3,4</sup>
- Simple Number Change	3/1/97C	Development of this functionality is complete. SWBT is currently performing internal testing. <sup>3,4</sup>
- Add/Disc Blocking	3/1-4/1/97C	Development of this functionality is complete. SWBT is currently performing internal testing. <sup>3,4</sup>
- PIC and Local PIC Change	4/1/97C	Development of the functionality for PIC Change is complete. SWBT is currently performing internal testing. <sup>3</sup> Development of Local PIC Change functionality is complete and will be made available when equal access to Intral.ATA toll is

<sup>2</sup>"Ready for Testing by LSPs" means SWBT has performed internal system programming to establish electronic interface capability, and developed necessary data fields so that the EDI interface testing can begin between SWBT and the LSP. SWBT and AT&T are working to mutually develop requirements where OBI/EDI standards have not been developed. SWBT is ready for testing and believes testing should be initiated prior to complete definition of available codesets.

<sup>3</sup> On 2/6/97 additional requirements were identified for Bill-on situations. Programming is currently being reworked to accommodate these new requirements. Completion is pending receipt of documentation from AT&T for a new codeset on an existing EDI field.

<sup>4</sup>SWBT and AT&T agreed on 2/6/97 to use SWBT USOC's and FIDs in lieu of incomplete national codesets. All additional features not previously mapped to feature codes will be defined by SWBT.

		implemented.
- Add/Disc Essential Lines	3/1-4/1/97C	Pending definition of business scenarios and USOC/FID feature code mapping according to AT&T product priority list. <sup>3,4</sup>
- Add/Disc Additional Lines	3/1-4/1/97C	Development of this functionality is complete. SWBT is currently performing internal testing. <sup>3,4</sup>
- Directory Listing Changes	4/1/97C	Development of this functionality for straight line listings is complete. SWBT ready for internal testing for straight line listings. <sup>3</sup> EDI mappings for non-straight line listings have not been defined. AT&T and SWBT will mutually establish capabilities beyond straight-line testing outside of the implementation plan.
- Suspend/Restore Non-Payment	1/1/97	Development of this functionality is complete. SWBT internal testing completed Ready for testing by LSPs. <sup>2,3</sup>
- Suspend/Restore Vacation Svc.	1/1/97	Development of this functionality is complete. SWBT internal testing completed Ready for testing by LSPs. <sup>2,3</sup>
Records Only Order	4/1/97C	Development of this functionality is complete. SWBT internal testing completed Ready for testing by LSPs. <sup>2,3,4</sup>
T&F Order	4/1/97C	Development of this functionality is complete for T orders with a straight line directory listing. SWBT internal testing completed. Ready for testing by LSPs. <sup>2,3,4</sup> EDI mappings for non-straight line listings have not been defined.
<b>NON-POTS SERVICE ORDERS</b>		
PBX Trunks	6/1/97T	Documentation to define business scenarios and ordering requirements provided to AT&T 3/10/97. Pending review by AT&T. EDI mapping must be completed. <sup>3,4</sup>
DID Trunks	6/1/97T	Documentation to define business scenarios and ordering requirements provided to AT&T 3/10/97. Pending review by AT&T. EDI mapping must be completed. <sup>3,4</sup>

<sup>1</sup>"Ready for Testing by LSPs" means SWBT has performed internal system programming to establish electronic interface capability, and developed necessary data fields so that the EDI interface testing can begin between SWBT and the LSP. SWBT and AT&T are working to mutually develop requirements where OBF/EDI standards have not been developed. SWBT is ready for testing and believes testing should be initiated prior to complete definition of available codesets.

<sup>3</sup> On 2/6/97 additional requirements were identified for Bill-on situations. Programming is currently being reworked to accommodate these new requirements. Completion is pending receipt of documentation from AT&T for a new codeset on an existing EDI field.

<sup>4</sup>SWBT and AT&T agreed on 2/6/97 to use SWBT USOC's and FIDs in lieu of incomplete national codesets. All additional features not previously mapped to feature code will be defined by SWBT.

Plexar	7/1/97T	Functionality is not achievable by target date. SWBT continues to be concerned about the difficulties of establishing an electronic interface which could support all the numerous codes required for this unique and extremely complex order type. SWBT handles this order type with manual, customer interactive processes. These processes should be used on LSP orders as well so that quality is assured and parity is maintained. AT&T and SWBT have agreed to mutually negotiate an implementation date for this functionality that may be beyond 6/1/97.
Digiline/ISDN	7/1/97T	Functionality is not achievable by target date. SWBT continues to be concerned about the difficulties of establishing an electronic interface which could support all the numerous codes required for this unique and extremely complex order type. SWBT handles this order type with manual, customer interactive processes. These processes should be used on LSP orders as well so that quality is assured and parity is maintained. AT&T and SWBT have agreed to mutually negotiate an implementation date for this functionality that may be beyond 6/1/97.
Semi-Public Phones	1/1/97C	SWBT internal testing completed for the line function. Ready for testing by LSPs. <sup>2,3,4</sup> SWBT USOC/FID mapping for additional feature codes in progress according to AT&T product priority list.
MegaLink (T1.5)	7/1/97T	Functionality is not achievable by target date. SWBT continues to be concerned about the difficulties of establishing an electronic interface which could support all the numerous codes required for this unique and extremely complex order type. SWBT handles this order type with manual, customer interactive processes. These processes should be used on LSP orders as well so that quality is assured and parity is maintained. AT&T and SWBT have agreed to mutually negotiate an implementation date for this functionality that may be beyond 6/1/97.

<sup>2</sup> "Ready for Testing by LSPs" means SWBT has performed internal system programming to establish electronic interface capability, and developed necessary data fields so that the EDI interface testing can begin between SWBT and the LSP. SWBT and AT&T are working to mutually develop requirements where OBF/EDI standards have not been developed. SWBT is ready for testing and believes testing should be initiated prior to complete definition of available codesets.

<sup>3</sup> On 2/6/97 additional requirements were identified for Bill-on situations. Programming is currently being reworked to accommodate these new requirements. Completion is pending receipt of documentation from AT&T for a new codeset on an existing EDI field.

<sup>4</sup> SWBT and AT&T agreed on 2/6/97 to use SWBT USOC's and FIDs in lieu of incomplete national codesets. All additional features not previously mapped to feature codes will be defined by SWBT.

<b>OTHER - SERVICE ORDER COMPONENTS</b>		
Multi-Line Hunting	4/1/97C	Documentation to define business scenarios and ordering requirements provided to AT&T 3/10/97. Pending review by AT&T. EDI mapping must be completed. <sup>1,4</sup>
Preferential Hunting	3/1/97C	Documentation to define business scenarios and ordering requirements provided to AT&T 3/10/97. Pending review by AT&T. EDI mapping must be completed. <sup>1,4</sup>
Transfer of Calls - Network Intercept	1/1/97	Development of TFC functionality is complete. For Disconnect orders, SWBT internal testing is completed and SWBT is ready for testing by LSPs. <sup>2,3,4</sup> SWBT is currently performing internal testing for TFC functionality associated with Change and T&F orders.
Toll Billing Exception (alternatively billed calls)	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. <sup>2,3,4</sup>
Handicap Services	1/1/97	Handicap services on Change orders and New Connect orders will be effective when those order types are implemented. SWBT USOC/FID mapping in progress according to the AT&T product priority list. <sup>3,4</sup>
ComCall	4/1/97C	Development of this functionality is complete. The SWBT USOC/FID mapping was completed 3/3/97. <sup>3,4</sup>
Future Expected Delivery Date (EDD)	4/1/97C	Development of this functionality is complete and available for any straight-line listing scenario.
Conversion When Final Bill Address Is Foreign PO	4/1/97C	Development of this functionality is complete. Ready for testing by LSPs. <sup>2,3</sup>

<sup>1</sup> "Ready for Testing by LSPs" means SWBT has performed internal system programming to establish electronic interface capability, and developed necessary data fields so that the EDI interface testing can begin between SWBT and the LSP. SWBT and AT&T are working to mutually develop requirements where OBI/EDI standards have not been developed. SWBT is ready for testing and believes testing should be initiated prior to complete definition of available codesets.

<sup>3</sup> On 2/6/97 additional requirements were identified for Bill-on situations. Programming is currently being reworked to accommodate these new requirements. Completion is pending receipt of documentation from AT&T for a new codeset on an existing EDI field.

<sup>4</sup> SWBT and AT&T agreed on 2/6/97 to use SWBT USOC's and FIDs in lieu of incomplete national codesets. All additional features not previously mapped to feature codes will be defined by SWBT.

<b>DIRECTORY LISTINGS</b>		
Directory Listing (Straight Line)		
- White	2/1/97C	Development complete for straight line directory listings. Ready for internal SWBT testing. <sup>1</sup>
- Yellow	N/A	
Directory Listing Other Than Straight Line		
- White	2/1/97C	EDI mappings for non-straight line listings have not been defined. <sup>1</sup> AT&T and SWBT will mutually establish capabilities beyond straight-line testing outside of the implementation plan.
- Yellow	N/A	
Directory Order Changes Prior to Publishing		
- White	N/A	
- Yellow	N/A	
Directory White Pages (Non-SWBT Areas)	N/A	
Directory Expedite		

<sup>1</sup> On 2/6/97 additional requirements were identified for Bill-on situations. Programming is currently being reworked to accommodate these new requirements. Completion is pending receipt of documentation from AT&T for a new codeset on an existing EDI field.

- White	N/A	
- Yellow	N/A	
<b>POST SERVICE ORDER EDI TRANSACTIONS</b>		
Supplemental Orders		
Firm Order Confirmation (FOC)	4/1/97C	Development of this functionality is complete. On 2/6/97 additional requirements were identified for Bill-on situations. Initial coding for Bill-on situations completed. SWBT internal testing in progress.
Jeopardies	?	By 4/1/97, SWBT will provide missed appointment information via the EDI 855 transaction. SWBT is exploring the data available for jeopardy information. A manual process to provide the information by phone, when and where available, is contemplated.
Rejects	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. <sup>1</sup>
Order Completion	1/1/97	Development of this functionality is complete. On 2/6/97 additional requirements were identified for Bill-on situations. Initial coding for Bill-on situations completed. SWBT internal testing in progress.

<sup>1</sup>“Ready for Testing by LSPs” means SWBT has performed internal system programming to establish electronic interface capability, and developed necessary data fields so that the EDI interface testing can begin between SWBT and the LSP. SWBT and AT&T are working to mutually develop requirements where OBF/EDI standards have not been developed. SWBT is ready for testing and believes testing should be initiated prior to complete definition of available codesets.

**SWBT STATUS REPORT ON NEW ELECTRONIC INTERFACES  
FOR PRE-ORDER AND ORDERING AND PROVISIONING FUNCTIONS FOR UNBUNDLED NETWORK ELEMENTS<sup>1</sup>**

<b>FUNCTION</b>	<b>SWBT AVAILABILITY</b>	<b>SWBT STATUS REPORT AS OF MARCH 15, 1997</b>
		<b>UNBUNDLED NETWORK ELEMENTS</b>
<b>PRE-ORDER</b>		
	1/1/97	For Pre-ordering, the functionalities are the same as those developed for Resale, with the exception of due date and dispatch functionality. <sup>1</sup> That is, address verification, services/features availability, telephone number assignment, and customer service record (CSR) for non-complex services. As of 1/1/97, development of these functionalities were complete. SWBT internal testing completed. Ready for testing by LSPs. <sup>2</sup> Complex CSR functionality will be complete by 4/15/97, with enhanced development to provide additional fields by 5/1/97. The additional fields include IDENT, SA, LIST, SIC AND BILL.
<b>ORDERING</b>		
	6/1/97	SWBT has developed an EDI Interface to receive Local Service Requests (LSR) for Unbundled Network Elements (UNE). This interface also electronically responds to the LSP with acknowledgments (including error conditions if applicable), Firm Order Confirmations and Service Order Completion notices. Effective 1/2/97, SWBT is ready for LSP testing of this interface. SWBT's UNI!

<sup>1</sup> SWBT continues to report separately for UNE, and is relying on the Commission's Order dated December 19, 1997 where it was confirmed that AT&T Exhibit 15A is applicable only to Resale, and that functionalities for UNE are developed separately.

<sup>2</sup> "Ready for testing by LSPs" means SWBT has performed internal system programming to establish electronic interface capability, and developed necessary data fields so that the EDI interface testing can begin between SWBT and the LSP. SWBT and AT&T are working to mutually develop requirements where ODF/EDI standards have not been developed. SWBT believes testing should be initiated prior to full requirements completion on a mutually agreeable schedule.

FUNCTION	SWBT AVAILABILITY	SWBT STATUS REPORT AS OF MARCH 15, 1997
		<b>UNBUNDLED NETWORK ELEMENTS</b>
		<p>EDI Interface is based on OBF/EDI national standards current with OBF definitions in final closure as of 1/2/97. This interface currently supports the ordering of the Local Loop, Local Loop with Interim Number Portability, Interim Number Portability, and Switch Ports for the following activity types: new connect, change, disconnect, inside move, outside move, records change, and conversion to new LSP.</p> <p>As a first step towards Operational Readiness Testing (ORT), SWBT provided AT&amp;T with LSR data element definitions currently supported by SWBT's EDI Gateway for Unbundled Network Elements on 1/29/97. On 3/12/97, SWBT provided AT&amp;T with a test plan to define ORT efforts. SWBT and AT&amp;T will meet 3/18-19/97 to begin discussion and clarification of SWBT UNE LSR documentation and the test plan.</p>



Exhibit ND-11  
6 Pages

**EXHIBIT ND-11**

**AT&T RESPONSE TO  
SOUTHWESTERN BELL TELEPHONE COMPANY'S  
MARCH 17, 1997 STATUS REPORT**



AT&T

Thomas C. Pelto  
Chief Regulatory Counsel

March 21, 1997

Suite 1500  
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Ms. Paula Mueller  
Secretary of the Commission  
Public Utility Commission of Texas  
1701 N. Congress Avenue  
P. O. Box 13326  
Austin, Texas 78711-3326

Re: Docket No. 16226

Dear Ms. Mueller:

This letter responds to the Status Report on development of real-time electronic interfaces filed by Southwestern Bell Telephone Company (SWBT) on March 17. Suffice to say that the Commission's March 5 clarification had minimal effect (actually, no perceptible effect at all) on SWBT's report on the status of implementation of electronic interfaces for unbundled network elements (UNE). About the only meaningful information conveyed by SWBT's scant filing on UNE interfaces is that either AT&T or SWBT continues to misapprehend the Commission's Arbitration Award as far as the requirements and due dates for cooperative development and testing of real-time electronic interfaces for UNEs are concerned. As a result, information on specific interfaces, functionality and order types for UNE continues to be completely missing from SWBT's March 17 status report.

To briefly frame the continuing controversy, paragraph 25 of the Arbitration Award requires that SWBT "provide real-time electronic interfaces that allow LSPs to perform preordering, ordering, provisioning, maintenance and repair, and billing for resale services *and* unbundled network elements." Thus, SWBT is required to develop real-time, electronic interfaces for the same or at least comparable interfaces, functionalities and order types for UNE (e.g. migration orders, "as is" and "with changes") as the Commission required for resale. That has been AT&T's interpretation of the Commission's Award and also appears to have been the Commission's consistent interpretation.<sup>1</sup>

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<sup>1</sup> The specific functionalities and order types for resale are set forth with particularity in AT&T Exh. 15A. What the Commission did not require was the same set of interim due dates for unbundled elements and therefore rejected AT&T's proposed contract language, because it would have incorporated those dates. The Commission did not, however, change its prior ruling to require 15A functionality for UNE.

However, as the parties were in the process of drafting the February 28 joint status report, SWBT informed AT&T of its belief that the Award did not require SWBT to develop real-time electronic interfaces for the same or comparable interfaces, functionalities and order types for UNE as were provided for resale. On this basis, SWBT declined to work with AT&T to develop a joint report that would address the specific interfaces, functions and order types being developed for UNE. Instead, the parties simply flagged the disagreement and corresponding need for clarification in the February 28 report.

Fortunately, the issue of electronic interfaces for UNE was specifically acknowledged by the Commission and discussed at some length at its March 5 Open Meeting. Unfortunately, despite the Commission's March 5 "clarifi[cation] on the record" (Wood, 3/5 Tr. at 166), the requirements for UNE interfaces remain misperceived, or at best dimly perceived, by either AT&T or SWBT.<sup>2</sup> Consistent with the Award and the Commission's March 5 discussion, it remains AT&T's view that the joint implementation efforts and status reports for UNE interfaces should be at the same level of detail in terms of the specific interfaces, functionality and order types as is the case for resale interfaces. SWBT clearly disagrees and, as its March 17 report on UNE indicates, persists in its view that SWBT has no obligation to develop the same or comparable interfaces, functionalities and order types for UNE.

Because of the continuing disconnect on UNE interfaces,<sup>3</sup> further clarification appears necessary.<sup>4</sup> Otherwise, the divergent views will simply persist.

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<sup>2</sup> On March 5, Chairman Wood stated his understanding that by June 1 "the provisioning, ordering and preordering [for] unbundled network elements would also be operational." Tr. at 165. And there was 3-0 concurrence with Mr. Siegel's view, on behalf of OPD, that "the award stated it needed to be real-time, electronic interfaces [with similar] intervals." Tr. at 165-66. Copies of the relevant transcript pages are attached.

<sup>3</sup> Though there is no pun intended, SWBT's interpretation of the Award could be colored by its desire to disconnect customers served via UNE, even if no rearrangement of the physical serving arrangement is requested or necessary and where a purely software-based change is involved (as with migration orders involving the UNE platform).

<sup>4</sup> AT&T apologizes for not having Ms. Dalton available on March 5, which could perhaps have helped crystalize the issue and avoid the continuing confusion. On the other hand, it is not completely clear whether SWBT has chosen to simply disregard the March 5 clarification, disagrees as to its effect, or both. In any event, Ms. Dalton will be available for the next posting of this item on March 26.

In sum, a process of joint development and cooperative testing is best calculated to produce a soft landing on June 1 and a joint report on June 13 which indicates that real-time electronic interfaces for UNEs work and that the relevant functionality and order types are available. The alternative is a crash landing on June 1 where SWBT presents an incomplete set of UNE interfaces that have not been cooperatively developed or tested and which therefore lack critical functionality. Interfaces for UNE that are operational (*i.e.* work to support rapid, broad-based entry) on June 1 is certainly what the Commission has stated it wants, but without the requested further clarification, that result is substantially jeopardized because UNE interfaces that do not support the relevant set of order types that LSPs can use to move customers are virtually worthless.<sup>5</sup>

Sincerely,



Thomas C. Peito  
Chief Regulatory Counsel

cc: Ms. Kathleen Hamilton, Administrative Law Judge, PUC  
Ms. Carole Vogel, Director, Office of Regulatory Affairs, PUC  
Mr. Kevin Zarling, Assistant Director, Legal Division/ORR, PUC  
Mr. Stephen Davis, Director, Office of Policy Development, PUC  
Mr. Howard Siegel, Chief Attorney, Office of Policy Development, PUC  
Mr. Bill Magness, Chief Counsel, Office of Policy Development, PUC  
All Parties of Record to Consolidated arbitration proceedings (facsimile)

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<sup>5</sup> If SWBT is not required to work cooperatively with AT&T and other LSPs on the UNE interfaces, then the situation with EASE on the resale side will likely repeat itself, or worse. SWBT will unilaterally develop non-industry standard, proprietary interfaces, with missing or incomplete functionality. Moreover, bearing in mind SWBT's attempts to thwart UNE competition at every level (*e.g.* the licensing provision) and its tendency to spring last-minute surprises (*e.g.* new found non-recurring charges), the opportunities for mischief with the UNE interfaces are immense and the consequences drastic — LSPs will not be able to provide service to Texans using the UNE platform if they cannot pass migration orders. Of course, SWBT would prefer not only that the fox guard the henhouse, but also that it warm the eggs and herd the hatchlings.

1 MR. SIEGEL: For the record,  
2 this is Howard Siegel, Office of Policy  
3 Development.

4 The main problem here is that  
5 there is -- there appears to be an  
6 ambiguity or potential ambiguity in the  
7 arbitration award. We use the language "to  
8 the same interval Southwestern Bell  
9 performs for itself," and AT&T says you  
10 should treat unbundled the same kind of  
11 intervals that resale has, and Southwestern  
12 Bell's response is -- appears to be that  
13 they don't do unbundled elements for  
14 themselves and, therefore, the same  
15 intervals don't exist.

16 COMM. WALSH: Never is a  
17 good time?

18 (Laughter)

19 MR. SIEGEL: My  
20 understanding of the intent of the award  
21 was to require the same time periods that  
22 were being required for resale and that  
23 similar intervals were applicable, but that  
24 seems to be the one policy issue that the  
25 parties disagree on and are having

1 difficulty. Outside of that there appears  
2 to be a lot of cooperation between the  
3 parties and the rest of the operational  
4 interfaces.

5 CHAIRMAN WOOD: I mean I --  
6 I'm not sure if it was exactly the same as  
7 resale or not, but Exhibit 15 A or  
8 whatever, Nancy Dalton's exhibit -- I don't  
9 remember what it was; it had a life of its  
10 own -- had a chart. And there were a lot  
11 of dates on that chart. And it seemed to  
12 me the reason why we did the checkup  
13 hearing on June 13th was that not only were  
14 the resale things, most of which were front  
15 loaded this month and last month and in  
16 January were going to be done, was that the  
17 provisioning and ordering and reordering  
18 issues under unbundled network elements  
19 would also be operational. And so I don't  
20 know if any clarification of the award is  
21 needed, but, I mean, this deal has got to  
22 work. It can't be done by FAX and phone.

23 MR. SIEGEL: And the award  
24 stated it needed to be real time,  
25 electronic interfaces, and I think that

1 implies the quick time intervals that are  
2 necessary.

3 COMM. WALSH: Do we need to  
4 do anything?

5 CHAIRMAN WOOD: Do we need  
6 to clarify that somehow?

7 MR. SIEGEL: I don't think  
8 so. If the Commission wants to state that  
9 their interpretation of the award, that  
10 generally the award stands for itself --

11 CHAIRMAN WOOD: And we just  
12 clarified that on the record --

13 COMM. GEE: Yeah.

14 CHAIRMAN WOOD: -- with  
15 three nods.

16 Anything else on this?

17 Again I appreciate -- to me this  
18 is back of the tone of the original  
19 hearing, at least as to AT&T and Bell on  
20 the original hearing back in October. I  
21 appreciate that personally. I think I  
22 speak for the three of us saying we hope  
23 you both want to get into each other's  
24 business as bad as your marketing people  
25 say that you do on TV. I think that the



7-22



# FILED

MAR 28 1997

BEFORE THE CORPORATION COMMISSION OF THE STATE OF OKLAHOMA  
COURT CLERK'S OFFICE - OKC  
CORPORATION COMMISSION  
OF OKLAHOMA

APPLICATION OF ERNEST G. JOHNSON, )  
DIRECTOR OF THE PUBLIC UTILITY )  
DIVISION, OKLAHOMA CORPORATION )  
COMMISSION TO EXPLORE THE )  
REQUIREMENTS OF SECTION 271 OF )  
THE TELECOMMUNICATIONS ACT OF 1996.)

Cause No. PUD 970000064

**AT&T'S MOTION TO TAKE DEPOSITIONS, TO MODIFY  
ORDER, AND TO SHORTEN NOTICE PROVISION**

COMES NOW AT&T Communications of the Southwest, Inc. ("AT&T") and pursuant to OAC 165:5-11-1 and Order No. 409904, requests the Commission to issue an Order permitting the depositions to be taken of the following individuals: Randy Butler, Bill Deere, Elizabeth Ham, Dale Kaeshoeffer, Kathleen Larkin and Karol Sweitzer.

AT&T requests the depositions in order to develop the factual record on issues critical to the Section 271 currently being conducted by this Commission and ultimately to be conducted by the Federal Communications Commission ("FCC").

AT&T was advised for the first time on Monday, March 24, 1997, that Southwestern Bell Telephone Company ("SWBT") does not intend to produce any witnesses at the evidentiary hearing currently scheduled for April 14-16, 1997. See Procedural Schedule, Order No. 409904. The information was shared in an AT&T-initiated discussion with counsel for SWBT concerning a proposed early exchange of witness lists. AT&T proposed exchanging witness lists prior to the April 1 deadline specified in the Procedural Schedule in order to facilitate final decisions about the scheduling of

depositions. It was in response to this proposal that AT&T first learned of SWBT's intentions not to make any witnesses available for cross examination at the April 14 hearing. The next day, AT&T formalized its request to take a limited number of depositions of those individuals who will not be made available at the time of the April 14-16 hearing. See Attachment A. AT&T followed up with a second written request to SWBT, attaching a draft of the Motion to Take Depositions. See Attachment B. SWBT has declined to agree to the taking of depositions and has opposed AT&T's attempt to have the Motion to Take Depositions specially set. See Attachment C.

The individuals whose depositions are being sought represent a limited number of the twenty-six or more individuals whose affidavits presumably will be submitted to the FCC as early as April 11, 1997, in support of SWBT's Section 271 application. The proposed location for the deposition of each witness is the place where each such individual is employed. AT&T had limited the number of proposed depositions in order to complete the depositions before the April 1 deadline for taking depositions.

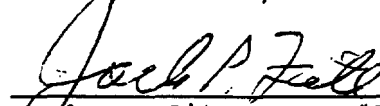
The ability to complete the depositions on the schedule originally proposed has been frustrated by SWBT's unwillingness to agree to the depositions, AT&T now also requests that the April 1 deadline for taking depositions be extended to April 11 and that the normal five-day notice of deposition be shortened to permit the depositions to occur on two-day notice.

Depositions are specifically contemplated by the Procedural Schedule and specifically authorized by 17 O.S. § 12. Without depositions, AT&T and other interest parties will have no ability to cross examine these SWBT witnesses (or, apparently, any SWBT witness) in order to conduct the factual development necessary for this Commission to make its recommendation concerning SWBT's entitlement to Section 271 interLATA relief. RFIs do not offer the same advantages as depositions because of the inability to ask follow-up questions and because the parties (other than Staff) are limited to a total of 30 RFIs. Similarly, informal discussions with SWBT on the topics to be covered in depositions will not be effective because of the inability to preserve SWBT responses for consideration by the Commission and the FCC.

WHEREFORE, AT&T requests this Commission to grant the relief requested herein.

Respectfully submitted,

WHITE, COFFEY, GALT & FITE, P.C.



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ATTORNEYS FOR AT&T COMMUNICATIONS  
OF THE SOUTHWEST, INC.

DATED March 28, 1997

CERTIFICATE OF MAILING

This is to certify that on this 28th day of March, 1997, a true and correct copy of the above and foregoing AT&T'S MOTION TO TAKE DEPOSITIONS, TO MODIFY ORDER, AND TO SHORTEN NOTICE PROVISION was mailed, postage prepaid to:

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March 25, 1997

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VIA FAX

Roger K. Toppins  
800 North Harvey, Room 310  
Oklahoma City, OK 73102

Re: PUD 970000064

Dear Roger:

AT&T would like to reach agreement with SWBT on a schedule of depositions to be taken in connection with the above-referenced docket. In our conversation earlier yesterday, you advised me of your understanding (subject to checking with others at your end) that SWBT does not intend to have any witnesses appear at the hearing scheduled for April 14 through 16, 1997. Putting aside the issue of how SWBT can even attempt to carry its burden without producing witnesses for cross examination, the immediate concern I have is the impact this information has on the need to use depositions to develop the factual record before the Oklahoma Commission. The lack of assurance that SWBT witnesses will be made available for cross examination at the hearing increases the number of depositions that we will want to develop the factual record before the Oklahoma Commission.

Subject to any changes that may be necessary after reviewing the materials SWBT intends to file tomorrow, AT&T requests the depositions of the following individuals:

Randy Butler  
Bill Deere  
Elizabeth Ham  
Dale Kaeshoeffler  
Michael Moore  
Linda Kramer or Nancy Lowrance  
Kathleen Larkin and Karol Sweitzer

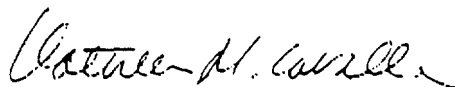
ATTACHMENT A

Roger K. Toppins  
March 25, 1997  
Page 2

Please let me know when and where SWBT would be willing to produce the witnesses.  
We would agree to extend the April 1 deadline, if necessary, to complete the depositions.

I look forward to hearing from you as soon as possible.

Very truly yours,



Kathleen M. LaValle

KMI/dc

cc: Ronald F. Stakem  
Martha Jenkins  
Nancy Thompson  
Ed Cadieux

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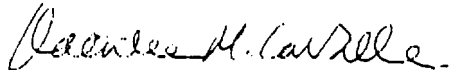
Roger K. Toppins  
800 North Harvey, Room 310  
Oklahoma City, OK 73102

Re: PUD 970000064

Dear Roger:

I am assuming that your schedule has kept you from responding to the letter I sent yesterday morning regarding the scheduling of depositions. Because of the timing involved, I have proceeded with the preparation of the attached AT&T's Motion to Take Depositions. Before we move forward with requesting a setting, could you please let me know whether SWBT is willing to agree to the schedule of depositions that is proposed in the motion? I would appreciate hearing from you as soon as possible.

Very truly yours,



Kathleen M. LaValle

KMI/dc  
attachment

cc: Jack Fite  
Ronald E. Stakem  
Martha Jenkins  
Nancy Thompson  
Ed Cadieux

ATTACHMENT B



BEFORE THE CORPORATION COMMISSION OF THE STATE OF OKLAHOMA

APPLICATION OF ERNEST G. §  
JOHNSON, DIRECTOR OF THE §  
PUBLIC UTILITY DIVISION, §  
OKLAHOMA CORPORATION § Cause No. PUD 970000064  
COMMISSION TO EXPLORE THE §  
REQUIREMENTS OF SECTION 271 §  
OF THE TELECOMMUNICATIONS §  
ACT OF 1996. §

AT&T'S MOTION TO TAKE DEPOSITIONS

COMES NOW AT&T Communications of the Southwest, Inc. ("AT&T") and pursuant to OAC 165:5-11-1 and Order No. 409904, requests the Commission to issue an Order approving the following deposition schedule:

Randy Butler	Tulsa, OK	Mon. March 31, 1997, 11 a.m.
Bill Deere	Dallas, TX	Tues. April 1, 1997, 10 a.m.
Elizabeth Ham	St. Louis, MO	Mon. March 31, 1997, 11 a.m.
Dale Kacshoeffter	St. Louis, MO	Tues. April 1, 1997, 9 a.m.
Kathleen Larkin	St. Louis, MO	Tues. April 1, 1997, 1 p.m.
Karol Sweitzer	Dallas, TX	Mon. March 1, 1997, 10 a.m.

AT&T requests the depositions in order to develop the factual record on issues critical to the Section 271 review currently being conducted by this Commission and ultimately to be conducted by the Federal Communications Commission ("FCC").

AT&T was advised for the first time on Tuesday, March 25, 1997, that Southwestern Bell Telephone Company ("SWBT") does not intend to produce any witnesses at the evidentiary hearing currently scheduled for April 14-16, 1997. See Procedural Schedule, Order No. 409904. The information was shared in an AT&T-initiated discussion with counsel for SWBT concerning a proposed early exchange of witness lists. AT&T proposed exchanging witness lists